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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 *In re Ex Parte* Application of  
18 PALANTIR TECHNOLOGIES INC.,

19 Applicant,

20 For an Order Pursuant to 28 U.S.C. § 1782 to  
Obtain Discovery from MARC L.  
21 ABRAMOWITZ for Use in Foreign  
Proceedings.

CASE NO.: 3:18-mc-80132-JSC

**DECLARATION OF STEPHEN L.  
WOHLGEMUTH IN SUPPORT OF  
MARC L. ABRAMOWITZ'S MOTION  
FOR LEAVE TO FILE SUR-REPLY TO  
PALANTIR'S *EX PARTE*  
APPLICATION FOR AN ORDER  
PURSUANT TO 28 U.S.C. § 1782  
GRANTING LEAVE TO OBTAIN  
DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS**

1 I, Stephen L. Wohlgemuth, hereby declare as follows:

2 1. I am an attorney at the law firm of Williams & Connolly LLP, which is counsel of  
3 record for Marc L. Abramowitz (“Abramowitz”) in the above-captioned matter. I make this  
4 declaration based on my own personal knowledge, and if called upon to do so, could and would  
5 testify competently thereto. I make this declaration in support of Abramowitz’s Motion for Leave  
6 to File a Sur-Reply to Palantir Technologies Inc.’s (“Palantir”) Ex Parte Application for an Order  
7 Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings.

8 2. I have corresponded with Palantir’s counsel of record in this action to ask if Palantir  
9 would agree to Abramowitz’s request for leave to file a sur-reply to Palantir’s *ex parte* application  
10 for § 1782 discovery. Counsel for Palantir communicated that Palantir does not agree to  
11 Abramowitz’s request. A true and correct copy of the correspondence between counsel for Palantir  
12 and me regarding Abramowitz’s request to file a sur-reply is attached hereto as **Exhibit J**.

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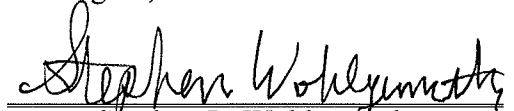
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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3  
4 Executed on September 28, 2018 in Washington, D.C.

5   
6 Stephen L. Wohlgenuth